



5.9.4 Web Accessibility

Chapter 5 - Information Technology	Original Effective Date: September 2006
Section: 5.9 Publishing on the World-Wide Web	Date Last Reviewed: July 2022
Responsible Entity: Vice President and Chief Information Officer	Date Last Revised: July 2022

I. Purpose

The University of Texas Health Science Center at San Antonio (UT Health San Antonio) is committed to ensuring the broadest possible access to the tools, services, and information made available online. The Texas Administrative Code (TAC) lays out standards and requirements for websites of state institutions of higher education that make those sites more accessible to users of all types. This includes users with different vision, hearing, mobility, cognition, or vocalization needs, those who use assistive technologies, mobile phones, tablets, and other devices to access websites, and those using Internet connections of varying speeds, emerging protocols, and other characteristics. To best serve our diverse user populations, this policy establishes a university standard for web accessibility that will support not only the TAC requirements but others that may apply to various aspects of our operations.

II. Scope

These requirements apply to all newly developed, changed, or updated websites and web applications built or operated by UT Health San Antonio.

III. Policy

UT Health San Antonio acknowledges its obligation to assure that its websites and web applications satisfy all applicable legal and regulatory requirements for accessibility by persons with disabilities and special needs. Although different applicable laws, regulations and policies may vary in their specific legal and technical requirements, it is beneficial for the University to establish a single set of specific, measurable targets for web accessibility that will reflect our commitment to universally accessible design and promote good-faith efforts to support the letter and spirit of these and other applicable policies.

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A. Standards

1. The [Web Content Accessibility Guidelines \(WCAG\)](#), established and maintained by the World Wide Web Consortium (W3C) and [Texas Administrative Code, Title 1, Rule §206.70](#) Accessibility, Institution of Higher Education Websites, establishes that all websites for Texas institutions of higher education should meet or exceed the AA level success criteria of WCAG version 2.0, although TAC §206.70 specifically excludes WCAG's Guideline 1.2 on Time-Based Media.

The University promotes understanding of the laws, and the goals of Web accessibility by publishing links to the full text of Texas Administrative Code, Title 1, Chapters [206](#), State Websites, and [213](#), Electronic and Information Resources.

2. In addition to fulfilling the requirements of Texas Administrative Code, Title 1, Rule §206.70 Accessibility, Institution of Higher Education Websites, this University policy supports compliance with additional requirements that may apply to various aspects of University operations, including but not limited to the following:
 - a. As a component of the University of Texas System: [UT System Policy UTS 150](#), Access by Persons with Disabilities to Electronic and Information Resources Procured or Developed by The University of Texas System Administration and The University of Texas System Institution, and the supporting procedures set forth in:
 - i. Office of General Counsel Bulletin 2006-1, Access by Persons with Disabilities to Electronic and Information Resources Procured by The University of Texas System Administration and The University of Texas System Institutions.
 - ii. Office of General Counsel Bulletin 2009-1, Access by Persons with Disabilities to Electronic and Information Resources Developed by The University of Texas System Administration and The University of Texas System Institutions.
 - b. As a Texas public institution of higher education: [Texas Administrative Code, Title 1, Rules §§213.30-213.41](#), Accessibility Standards for Institutions of Higher Education.
 - c. As a provider of health programs/activities which receive funding from the US Department of Health and Human Services (HHS): [Section 1557 of the Patient Protection and Affordable Care Act](#).
 - d. As a provider of other programs that receive federal assistance: [Section 504 of the Rehabilitation Act of 1973](#).
 - e. As an employer: [Title I of the Americans with Disabilities Act](#).
 - f. As a state government entity: [Title II of the Americans with Disabilities Act](#).

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- g. As an operator of places of public accommodation, such as our libraries and clinics: [Title III of the Americans with Disabilities Act](#).

B. Requirements

1. To ensure compliance not only with TAC §206.70 but also with other applicable policies, the University has established the following accessibility standards. All newly developed, changed, or updated University websites and web applications must:
 - a. Fulfill the success criteria of WCAG 2.0 Guideline 1.2 (Time-Based Media) at level A.
 - b. Fulfill all other WCAG 2.0 success criteria at level AA [§206.70 (a)].
 - c. Support variations in internet connection speeds and emerging communications protocols and technologies [§206.70 (f)(1)].
 - d. Adapt content to end-user devices such as mobile phones, tablets, and other devices available to the general public [§206.70 (f)(2)]; and must
 - e. Be evaluated using one or more accessibility validation methods, including but not limited to automated methods, manual methods or assistive technologies, to confirm they meet or exceed the requirements of this policy [§206.70 (d)].
2. If the criteria listed above cannot be fulfilled for a particular University website or web application, an alternative version of the page, form, application, document, or other resource must:
 - a. Be provided and offer equivalent information or functionality.
 - b. Remain synchronized to the primary version; and
 - c. Be updated whenever the primary version changes [§206.70 (c)].

C. Responsibilities

Each University website or web application is created, operated and/or maintained by a university employee who is the “publisher” of the website or web application. It is the responsibility of both the publisher of a university website and that publisher’s vice president, dean, chair and/or director to ensure that such websites comply with this policy and other applicable policies. The publisher of each website is responsible for:

1. Conducting the testing described under the Requirements section of this policy,
2. Using resources such as “[How to Meet WCAG \(Quick Reference\)](#)” to understand how to address issues identified in testing,
3. Reaching out to the Department of Web Initiatives, Institutional Compliance and Privacy Office, and/or the Office of Legal Affairs for help understanding the requirements, as needed, and

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4. Addressing issues identified in testing, using the criteria described in the Requirements section of this policy.

D. Requests under the Americans with Disabilities Act (ADA)

1. In the event that an individual requests a reasonable accommodation under the Americans with Disabilities Act (ADA) with respect to a UT Health San Antonio website, it is the responsibility of the ADA coordinator and the publisher of the website to comply with the Institutional Handbook of Operating Policies (IHOP) policy [4.2.3, Request for Accommodations Under the ADA and ADA Amendment Act of 2008 \(ADAAA\)](#), in order to address the request.
2. Individuals may direct comments, complaints or suggestions concerning accessibility issues with a university website by email accessibility@uthscsa.edu or by mail to:
 - a. American with Disabilities Act (ADA) Coordinator
UT Health San Antonio
7703 Floyd Curl Drive
San Antonio, Texas 78229-3900
 - b. Accessibility Coordinator
UT Health San Antonio
7703 Floyd Curl Drive
San Antonio, Texas 78229-3900

IV. Definitions

Web Content Accessibility Guidelines (WCAG), and level A and AA support of their success criteria, are [explained and defined by the Web Accessibility Initiative](#) of the World Wide Web Consortium. In particular, see “[How to Meet WCAG \(Quick Reference\)](#).”

Other terms referenced by TAC §206.70 are defined in [TAC §206.1, “Definitions”](#).

V. Related References

For questions regarding this policy or assistance with a university website or web application, contact the Web Team at webteam@uthscsa.edu.

VI. Review and Approval History

- A. The approving authority of this policy is the University Executive Committee.
- B. The review frequency cycle is set for three years following the last review date, a time period that is not mandated by regulatory, accreditation, or other authority.

Effective Date	Action Taken	Approved By	Date Approved
09/2006	Policy Origination		
11/2019	Policy Revision		
07/2022	Policy Revision	AVP for IT Services/ICPO	07/21/22